

# EXHIBIT A

**Joanna C. Hendon**

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**From:** Joanna C. Hendon  
**Sent:** Friday, February 21, 2020 3:10 PM  
**To:** Alexander Rodney; Andrew Kincaid; Cynthia Chen  
**Cc:** Roberta Kaplan; John Quinn; Matthew Craig; Benjamin White; Emily Cole; 'Andrew G. Celli'; 'Andrew Wilson'; 'Katie Rosenfeld'; 'Matthew D. Brinckerhoff'; David Berman; 'Nick Bourland'  
**Subject:** RE: Doe v. Trump, No. 18 Civ. 9936 -- Draft Joint Letter Motion re Extension of Certain Discovery Deadlines

We intend to oppose any request to extend the discovery deadlines in this case. Plaintiffs should make this application without us. You may of course reflect that Defendants previously were amenable to the proposed extensions, because we were. But we are no longer. Nor is it likely that meeting and conferring would alter our position, although we will of course make ourselves available next week (I think Andrew returns Monday) if you would like to.

Kind regards,  
Joanna

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**From:** Alexander Rodney <arodney@kaplanhecker.com>  
**Sent:** Friday, February 21, 2020 2:05 PM  
**To:** Joanna C. Hendon <jhendon@spearsimes.com>; Andrew Kincaid <akincaid@spearsimes.com>; Cynthia Chen <cchen@spearsimes.com>  
**Cc:** Roberta Kaplan <rkaplan@kaplanhecker.com>; John Quinn <jquinn@kaplanhecker.com>; Matthew Craig <mcraig@kaplanhecker.com>; Benjamin White <bwhite@kaplanhecker.com>; Emily Cole <ecole@kaplanhecker.com>; 'Andrew G. Celli' <acelli@ecbalaw.com>; 'Andrew Wilson' <awilson@ecbalaw.com>; 'Katie Rosenfeld' <Krosenfeld@ecbalaw.com>; 'Matthew D. Brinckerhoff' <mbrinckerhoff@ecbalaw.com>; David Berman <DBerman@ecbalaw.com>; 'Nick Bourland' <NBourland@ecbalaw.com>  
**Subject:** RE: Doe v. Trump, No. 18 Civ. 9936 -- Draft Joint Letter Motion re Extension of Certain Discovery Deadlines

Counsel:

Further to my email below, please let us know of any comments on the proposed joint application to extend certain discovery deadlines.

Regards,

Alex

**Alexander Rodney | Kaplan Hecker & Fink LLP**

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**From:** Alexander Rodney

**Sent:** Tuesday, February 18, 2020 10:17 AM

**To:** Joanna C. Hendon <[jhendon@spearsimes.com](mailto:jhendon@spearsimes.com)>; Andrew Kincaid <[akincaid@spearsimes.com](mailto:akincaid@spearsimes.com)>; Cynthia Chen <[ccchen@spearsimes.com](mailto:ccchen@spearsimes.com)>

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**Subject:** FW: Doe v. Trump, No. 18 Civ. 9936 -- Draft Joint Letter Motion re Extension of Certain Discovery Deadlines

Counsel:

Further to our correspondence on this matter earlier this month, attached is a proposed joint application to extend certain discovery deadlines. Please let us know of any comments.

Regards,

Alex

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**From:** Andrew Kincaid <[akincaid@spearsimes.com](mailto:akincaid@spearsimes.com)>

**Sent:** Monday, February 3, 2020 3:16 PM

**To:** Alexander Rodney <[arodney@kaplanhecker.com](mailto:arodney@kaplanhecker.com)>; Joanna C. Hendon <[jhendon@spearsimes.com](mailto:jhendon@spearsimes.com)>; Cynthia Chen <[ccchen@spearsimes.com](mailto:ccchen@spearsimes.com)>

**Cc:** Roberta Kaplan <[rkaplan@kaplanhecker.com](mailto:rkaplan@kaplanhecker.com)>; John Quinn <[jquinn@kaplanhecker.com](mailto:jquinn@kaplanhecker.com)>; Matthew Craig <[mcraig@kaplanhecker.com](mailto:mcraig@kaplanhecker.com)>; Benjamin White <[bwhite@kaplanhecker.com](mailto:bwhite@kaplanhecker.com)>; Emily Cole <[ecole@kaplanhecker.com](mailto:ecole@kaplanhecker.com)>; 'Andrew G. Celli' <[acelli@ecbalaw.com](mailto:acelli@ecbalaw.com)>; 'Andrew Wilson' <[awilson@ecbalaw.com](mailto:awilson@ecbalaw.com)>; 'Katie Rosenfeld' <[Krosenfeld@ecbalaw.com](mailto:Krosenfeld@ecbalaw.com)>; 'Matthew D. Brinckerhoff' <[mbrinckerhoff@ecbalaw.com](mailto:mbrinckerhoff@ecbalaw.com)>; 'Nick Bourland' <[NBourland@ecbalaw.com](mailto:NBourland@ecbalaw.com)>

**Subject:** RE: Doe v. Trump, No. 18 Civ. 9936 -- Draft Joint Schedule for Expert Disclosures

Alex,

We have no further comments on this draft. You have permission to sign electronically on our behalf and to file the current draft of the joint schedule for expert disclosures.

For the avoidance of doubt, Defendants' agreement to this joint schedule is without prejudice to seeking any future extension to these or other deadlines in this case, as appropriate.